U.S. Environmental Protection Agency

Comment 1: Concern about how the purpose and need are justified. The Draft EIS states that, by the design year, traffic volume on portions of the roadway will exceed IDOT's travel criterion of a maximum of 800 vehicles/hour on a 2-lane rural highway, and the maximum service volume for LOS C. The Draft EIS does not describe which portions of U.S. 67 will exceed these criteria, and if only minor portions of the roadway will exceed criteria, then it would not be necessary to implement a solution throughout the entire project area.

Response 1: Forecasted traffic volumes (Average Daily Traffic) are summarized in Section 1.3.3 of the document (Purpose and Need--Travel Efficiency) and additional detail is presented in Exhibits 2-2a, 2-2b and 2-2c of the Combined Location/Design Report. Design hourly volume would be approximately 11 percent of ADT. Given that percentage (referred to as the "K" factor), forecasted volume in the design year, 2030, would exceed 800 vehicles per hour (vph) on the existing highway for the entire length between Jacksonville and Beardstown (projected hourly volume of from approximately 950 to 1900 vph). North of the Illinois River, the projected hourly volume would be greater than 800 vph between the river and Rushville (projected hourly volume of from approximately 800 to 1,250 vph).

Between Rushville and Macomb, the design hourly volume would drop below 800 vph. The segments where hourly volume would exceed 800 vph could hardly be termed "minor portions." They make up approximately 60 percent of the total project length. Since projected traffic warrants a 4-lane cross section at least between Jacksonville and Rushville, and because the cross section from Macomb north will be 4-lanes, it would be inconsistent and, perhaps, unsafe to insert a relatively short 2-lane segment between the two. From the standpoint of design consistency and driver expectation, a 4-lane cross section is justified throughout the entire length of the project.

In addition, the DEIS would provide a highway which would bypass several communities in the project area. Alternative A would bypass Concord, Arenzville, Beardstown, Rushville, and Industry. Alternative E would bypass Chapin, Beardstown, Rushville, and Industry. The DEIS states that, "The non-beneficial effects of a highway bypass are principally economic (i.e., the potential loss of revenue for highway-oriented business)". This effect would not meet the need for economic development as stated in the DEIS. **2**

Of the two different alignment alternatives presented in the DEIS, Alternative E seems to be preferable. From an environmental standpoint, Alternative A would cause more adverse impacts than Alternative E. Since Alternative A would be a new alignment, it would fragment the existing habitat in the project area. This would adversely affect wildlife in the area, including the Illinois Chorus Frog, a state threatened species. Alternative A also directly impacts about eight more acres of wetlands than alternative E. According to the DEIS, a municipal well serving the Arenzville community is 164 feet east of the project right of way of Alternative A; no additional communities would be affected by Alternative E. In addition to environmental reasons, the purpose and need, as stated by the DEIS, seem to support Alternative E. One of the stated needs in the DEIS is to support economic development. According to the DEIS, Meredosia is one of the principal communities in the project area. In addition, Meredosia houses some of the major employers in the project area. It would seem as if the alternatives in the DEIS would provide a highway which is close to Meredosia, in order to support this significant economic center. However, Alternative A would provide a highway that is about eight miles further from Meredosia, when compared to the roadway's present alignment. By this logic, it seems as if Alternative A would detract the need stated by the DEIS. Finally, air pollutants from vehicle emissions would increase in the Alternative A corridor. Since this corridor includes the Triopia School (south of Arenzville), the students could be adversely affected by this alternative. **3**

We are concerned about the potential for surface water quality impacts. Construction activities in the project corridor would cause erosion and sedimentation. In addition, the DEIS indicates that highway stream crossings for the two build alternatives would involve in-stream construction work. Such work would increase the turbidity and sedimentation of the streams. In addition to construction impacts, the DEIS shows that there may be impacts to surface waters from stormwater runoff. The DEIS cites eight notable waterbody crossings across common segments of the U.S. 67 expansion project: Grindstone Creek, West Branch of Sugar Creek, East Fork of Crane Creek, Horney Branch, and Mauvaise Terre Creek due to their habitat quality designations, and associated floodplain wetlands and significant botanical sites; Schuy-Rush Lake, due to its "significant public water" designation, associated wetlands, and wildlife habitat areas; and Illinois River and Curry Lake, due to its associated wetlands and the magnitude of its crossings. The Illinois River is also the drinking water source for the Jacksonville community. Impacts from erosion, turbidity, and sedimentation to these waterbodies may be significant. In addition, the DEIS indicates that fish that are intolerant and intermediately tolerant of degraded water conditions occur in the following waterbodies: Horney Branch, West Branch of Sugar Creek, Grindstone Creek, and Carter Creek. Impacts to these waterbodies could adversely affect the fish there. The DEIS states that proper construction and erosion control techniques will be **4a** **4**

U.S. Environmental Protection Agency

Comment 2: Both of the proposed alternatives would bypass several communities in the area, and cause non-beneficial effects to highway-oriented businesses. This effect would not meet the need for economic development as stated in the Purpose and Need for the project.

Response 2: The roadway is being built to satisfy a larger regional need. It is acknowledged that there will be some local business casualties as a result of the proposed improvements. However, the economic analysis demonstrated a tremendous economic advantage to the local economies that would more than offset any individual business losses on certain bypass segments.

Comment 3: Alternative E seems to be preferable to Alternative A, based on environmental effects, economic development, and an air quality standpoint.

Response 3: Your comments giving preference to Alternative E from an economic and environmental standpoint are noted, and are consistent with IDOT's selection.

Comment 4a: Concern about potential for surface water quality impacts and potential fisheries impacts during construction. Recommend that the project include a surface water quality monitoring program to monitor effectiveness of construction and erosion control techniques and measures.

Response 4a: We do not agree that a surface water quality monitoring program would be of value. The major water quality impact to area streams would be the introduction of sediment from construction activities in and around the streams. The mandatory use of erosion and sediment control, as well as good construction practices should greatly minimize sediment movement. The project will have associated with it an NPDES construction permit, which requires a sediment and erosion control, plan. This plan is prepared during the design phase of the project. Each stream crossing will also be subject to a Section 404 permit from the Corps of Engineers and 401 water quality certification from Illinois EPA. Both of these permits require sediment and erosion control measures.

used to mitigate surface water quality impacts. Also, the DEIS states that impacts from stormwater runoff will be mitigated. However, the project should include a surface water quality monitoring program to monitor the effectiveness of mitigation measures. Also, project dates should be restricted to prevent construction activity during the fish spawning season. This will insure that project activities do not affect fish during these critical periods. **4b**

We are concerned about in-stream construction activities at waterbodies throughout the project corridor, due to the potential impact to water quality. We have this concern, because there is a potential for petroleum products and other contaminants to enter the waterbodies. Therefore, an appropriate staging area should be used, and equipment should be kept out of the water ways. If that is not possible, then construction equipment should be cleaned and inspected for any leaks, to ensure that no contaminants from the construction equipment will pollute the waterbodies. Any measures to protect the river should be written in the project contract. **4c**

4

The DEIS states that the existing U.S. 67 bridge at the Illinois River will likely be demolished by explosives. The demolished structure would be allowed to fall into the river; the debris would later be collected and disposed. Such a demolition method would cause an adverse impact to the Illinois River, since contaminants from the rubble would enter the river. The DEIS does not justify the need either to demolish this bridge or to use the explosive demolition method, nor does it compare it to other methods that may cause a less adverse impact. We have concerns over using explosive demolition methods at the bridge over the Illinois River if it can be shown that a more environmentally friendly method could be practically accomplished. We urge close coordination with the U.S. Army Corps of Engineers and the U.S. Coast Guard regarding bridge demolition and construction, because of potential impacts on this navigable waterway. **5**

We are concerned about the potential for the project to impact groundwater resources in the project area. The DEIS states that the underlying geologic materials in the project area widely vary in permeability. Therefore, the potential for groundwater contamination (from project activities and subsequent highway runoff contaminants) also vary in the project area. According to the DEIS, a municipal well serving the Arenzville community is 164 feet east of the project right of way of Alternative A (as stated above). Also, 29 private groundwater wells are within 200 feet of the project right of way for the build alternatives. These groundwater wells could be adversely affected by groundwater contamination from the project. The DEIS commits to implement steps to mitigate groundwater contamination during the road construction project, but does not commit to long term mitigation during highway operation. The DEIS should commit to such steps, and commit to monitor groundwater quality, in order to measure the effectiveness of mitigation measures. **6**

In summary, U.S. EPA has identified issues relating to the purpose and need of the project, the choices of alignment alternatives, surface water quality impacts, and groundwater quality impacts. Based upon our review of this project and its DEIS, we have assigned a rating of "EC-2" (environmental concerns, insufficient information). Please refer to the enclosed Summary of Rating Definitions Sheet. This rating will be published in the Federal Register. If you have any

U.S. Environmental Protection Agency

Comment 4b: Recommend that project dates be restricted to prevent construction activity during fish spawning season.

Response 4b: Regarding the comment that project dates should be restricted to prevent construction activity during the fish spawning season, the fish spawning season is generally February through June. We do not believe that construction should be restricted for fish spawning. This is based on the following: 1) there are no endangered or threatened species (state or federal) in these streams; 2) none of these streams are rated as Unique Aquatic Resources (BSC "A" streams which in Illinois are considered high quality streams); 3) none are designated by the Illinois Department of Natural Resources as Aquatic Natural Areas or Land and Water Reserves; 4) and flow regime (the East Fork Crane Creek and Horney Branch are intermittent streams; four of the streams East Fork Crane Creek, Horney Branch, Grindstone Creek and West Branch Sugar Creek have 7-Day 10-Year low flows of zero (i.e., there is no flow within these streams for at least 7 days in a given 10 year period).

Comment 4c: Concern about in-stream construction activities at waterbodies throughout the project corridor and potential for petroleum products and other contaminants to enter waterbodies. Recommend that an appropriate staging area be used and equipment be kept out of waterways, or that construction equipment be cleaned and inspected for leaks to ensure that no contaminants from equipment pollute the waterbodies.

Response 4c: The Draft EIS mentions "staging areas" in Section 4.19.2.4 (Commitments--Water Quality and Hydrology) (third full paragraph, last sentence). In general, construction equipment is not supposed to be in the stream. All work in-stream is supposed to be done from causeways, work pads, haul roads, etc. These temporary in-stream work devices are constructed from clean, aggregate materials per 404 Nationwide 33 Corps of Engineers permit. After completion of the job, they are removed and disposed of at upland sites. In addition to clean aggregate, the Department has also used armorflex (articulating concrete slabs) at stream crossings. Construction equipment is not supposed to be cleaned or washed in a stream or other water resource. Generally, construction equipment is kept on the right-of-way when not in use.

Comment 5: Concern about the proposed demolition method for the existing U.S. 67 bridge over the Illinois River.

Response 5: For purposes of the Draft EIS, we assumed a traditional approach for bridge demolition, but no specific demolition plan has been adopted. Whatever method is selected will be coordinated with the U.S. Coast Guard. It is premature at this time to have a detailed demolition plan, and this will be developed and coordinated in the next design phase.

Comment 6: Concern about the potential for the project to impact groundwater resources. Additional commitments to long term mitigation during highway operation, and to monitor groundwater quality, in order to measure the effectiveness of mitigation measures, should be added.

Response 6: Municipal and private wells near the proposed highway improvement were identified in the DRAFT EIS, and represent a potential risk for contamination from roadway runoff. The potential for contamination is dependent upon the well construction, proximity

to the potential source, and geological conditions. The Illinois Groundwater Protection Act provides protective setback regulations for groundwater wells. Private wells have a 60 - meter (200 feet) setback from potential contamination sources, while municipal wells have a 121-meter (400-feet) setback. The preferred alternative (Alternative E), as well as Alternative A have wells within these setback limits. The potential contamination risks to these wells from the proposed project will require further investigations to define more accurately the conditions described above (i.e. proximity to source, well construction, etc.). Based on this information, specific strategies can be developed to protect the wells if needed. Among these strategies could include spill prevention measures during construction and operations, and runoff control such as filter strips or buffer areas located between the roadway and well locations.

questions or comments, please feel free to contact Newton Ellens, of my staff, at (312) 353-5562.

Sincerely yours,

Kenneth A. Westlake
Chief, Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

Enclosure

Victor Modeer, P.E.
District Engineer
Illinois Department of Transportation

Illinois
Department of
Natural Resources
524 South Second Street, Springfield, Illinois 62701-1787
http://dnr.state.il.us
George H. Ryan, Governor • Brent Manning, Director

September 10, 2001

Mr. Victor Modeer, P.E
Illinois Dept. Of Transportation, District 6
126 East Ash Street
Springfield, Illinois 62704-4792

RE: DEIS Review
F.A.P. 310 (U.S. 67)
Jacksonville to Macomb
Morgan, Cass, Schuyler, and
McDonough Counties

Dear Mr. Modeer:

The Illinois Department of Natural Resources (IDNR) has reviewed the Draft Environmental Impact Statement for F.A.P. 310 (U.S. 67) from Jacksonville, Illinois to Macomb, Illinois in the counties of Morgan, Cass, Schuyler, and McDonough and have the following comments.

Alternative "A" Alignment:

This alignment is a totally new alignment from Jacksonville to near Beardstown, where it then joins a common alignment to Macomb. This alignment has the most resources present, eight Illinois threatened or endangered species that would be adversely impacted, two plant species, two terrestrial invertebrate species, one reptile species, and one amphibian species. In addition, this alignment would impact approximately 8.0 additional acres of wetlands than Alignment "E". The establishment of a new highway corridor would also cause additional wildlife casualties as travel corridors would be disrupted.

Alternative "E" Alignment:

This alignment follows the existing alignment of U.S. 67 and has fewer impacts to resources present. This alignment would adversely impact three Illinois threatened and endangered species, two plant species and one amphibian. Wetland impacts would be approximately 8.0 acres less than alignment "A". Travel corridors for wildlife are already established and would pose less intrusion to their movement through the highway corridor.

Common Alignment:

Both alternatives share a common alignment (near Beardstown/Illinois River) in the vicinity of the Beardstown Marsh Natural Area which supports a large number of amphibians, reptiles, birds and plant species. Even though the project will not directly impact the INAI site except for 0.21 acre, there will be impacts to the surrounding wetlands (9.28 acres) that act as a buffer to protect the Beardstown Marsh. It is felt that there is potential for changes in the hydrology that could alter the

aquatic ecosystem of the INAI site. The Illinois chorus frog is also known to inhabit at least five locations that will be impacted on this common alignment. IDNR feels there could be additional locations of chorus frogs not yet identified.

Areas of Special Interest:

The Department of Natural Resources (IDNR) feels that continued efforts should be made to use bridge structures in areas of wetlands and Illinois chorus frog habitat that occur on the western edge of the marsh and south of the Illinois River bridge. This bridging would allow the chorus frogs to move within the existing populations and breeding ponds, thus preventing isolation of certain populations. This is referenced in your letter of August 2, 2000 that attempts would be made to address this issue as a means of avoiding impacts. Another concern the Department (IDNR) wishes to address at this time is the possible installation of water control structures (special culverts) around the Beardstown Marsh to control the hydrology. In the event that this site would in the future come under a conservation effort to maintain its' aquatic integrity, the ability to control water levels would be in place. 1

Wetlands:

The Wetlands Program Manager has been extensively involved with the discussions on the potential wetland impacts and mitigation efforts. The Wetlands Program concurs with the need to continue to evaluate carrying the road on the bridge structure in sensitive areas around the perimeter of the marsh, especially in areas where the Illinois chorus frogs have been located. The road corridor impacts what is considered to be the buffer area of the INAI site and all impacts within this area should be mitigated at the higher ratio (5.5:1). Road construction around the marsh will promote additional development which will increase collateral impacts to the marsh and its ability to support wildlife and maintain its hydrological integrity. IDOT's selection of off-site wetland compensation site (Wessel Property) is considered to be an IDNR approved wetland mitigation area for this project pending the approval of the Mitigation Banking Instrument by the COE and IDNR. 2

IDNR Acquisition:

The former Lewis Landfill (landfill site) is a 40-acre parcel located in Cass County near Beardstown, Illinois. The landfill site falls within the Illinois River Section of the Illinois and Mississippi Rivers Sand Areas Natural Division. This Natural Division encompasses the sand areas, dunes, and bottomlands of the Illinois and Mississippi Rivers. Dry sand prairie is natural to this area and much of the flora and fauna found here are more typical of the Western U.S. prairie regions. Sand prairie remains one of the most endangered habitats to be found in the Midwest, and these areas support several plant and animal species that can be found in very few other places in Illinois. The landfill site boasts populations of the state endangered Illinois mud turtle (*Kinosternon flavescens spooneri*) and state threatened Illinois chorus frog (*Pseudacris streckeri*). The recently listed state threatened butterfly, the Regal Fritillary (*Speyeria idalia*), is also found on the site. The site also contains populations of at least two state threatened plant species, Hall's bulrush (*Scirpus hallii*), and Gray's sedge (*Cyperus grayiodes*), along with populations of the recently de-listed large bracted corydalis (*Corydalis curvisiliqua* var. 3

Illinois Department of Natural Resources

Comment 1: Continued efforts should be made to use bridge structures in areas of wetlands and Illinois chorus frog habitat that occur on the western edge of the Beardstown Marsh and south of the Illinois River bridge. Consider installation of water control structures around the Beardstown Marsh to control the hydrology, in the event that this site would in the future come under a conservation effort to maintain its' aquatic integrity.

Response 1: Bridge structures, rather than culverts, are proposed wherever there are water/wetland crossings in the Beardstown Marsh area. Specifically, there are two locations where bridges have been used:

- Sta.69+759 (crossing Wetland Site 19)--duel bridges approximately 170 meters (561 feet) length each.
- Sta.70+411 (crossing Wetland Site 30)--this bridge will tie to the river crossing bridge. It is about 100 meters (328 feet) long.

The Beardstown Marsh is largely held in private ownership. The placement of water control structures on private property for the purposes of maintaining the long-term aquatic integrity of the marsh is viewed by IDOT as a potential liability. The concern is related to the potential for an incident caused by the improper management of the water control structures that could endanger private property or life.

Comment 2: The proposed road corridor impacts what is considered to be the buffer area of the Beardstown Marsh INAI site and all impacts within this area should be mitigated at the higher ratio of 5.5:1.

Response 2: The Implementing Procedures for the Interagency Wetland Policy Act of 1989 does not consider buffer areas to be subject to higher mitigation ratios. Therefore, the mitigation ratios as depicted in the DRAFT EIS are correct.

Regarding the off-site wetland compensation site (Wessel Property), we note that this is considered to be an accepted IDNR wetland mitigation area for this project pending approval of the Mitigation Banking Instrument by the Mitigation Bank Review Team (MBRT) The review team includes: US Environmental Protection Agency, US Fish and Wildlife Service, Illinois Department of Natural Resources, and US Army Corps of Engineers – St. Louis and Rock Island.

grandibracteata). The condition of the sand prairie on the landfill site is degraded but improving with increasing time since waste deposition has ceased. Threatened and endangered plant populations appear to be stable to increasing. Large chorus frog populations utilize on-site sand ponds and ponds on adjacent land parcels. Regal fritillary surveys have shown numbers on this site to be exceptionally high as compared to other surveyed areas. Mud turtles have been trapped on this site since 1997, though no firm population figures have been determined. However, in early Summer 1999, a small juvenile was captured and released here, suggesting recent reproduction in this population; one of the only mud turtle sites in the state to show such growth.

The Office of the Attorney General of Illinois, the Illinois Environmental Protection Agency (IEPA), and the Illinois Department of Natural Resources (IDNR) are currently in negotiations involving the donation of the landfill. The negotiations involve concerns regarding remediation issues and ownership liability. If each organization's needs are met, the property will be donated to the IDNR and managed for the sensitive species existing there.

A 40-acre parcel immediately adjacent and to the south of the landfill site is owned and managed by New Dominion and contains sand prairie blowout areas and dunes. Mud turtles located on the landfill site are suspected to use the New Dominion-owned parcel as an aestivation site. The combination of the landfill and the adjacent New Dominion property would provide essential breeding and hibernating habitat for the sensitive species. A conservation easement is being pursued by New Dominion. Acceptance of the proposed easement is being requested of the Illinois Nature Preserves Commission (INPC) and the Illinois Department of Natural Resources (IDNR) for finalization of the easement. IDNR staff are currently drafting documents to present to the INPC regarding the natural resources and the management of those resources present on the easement property and the landfill property.

Additional parcels to the south-southwest of the landfill site, currently under other private ownership, contain cattail wetlands and sand prairie. These parcels represent excellent potential expansion sites for a proposed mud turtle reserve, and present opportunities to restore and manage a significant acreage of rare sand prairie habitat.

3

Mitigation Measures and Commitments:

The Mitigation Measures and Commitments on pages 4-69 through 4-75 adequately address the impacts to natural resources and the efforts to compensate for their loss. It is especially important as the final design phase is implemented to continue minimizing these impacts by narrowing the overall highway width to its least intrusive design on the natural resources.

Summary:

Based on the information provided in the DEIS, the Department of Natural Resources (IDNR) would recommend that Alignment "E" be pursued as the final alternate because of less adverse impacts to environmentally sensitive areas.

4

Illinois Department of Natural Resources

Comment 3: IDNR is currently in negotiations involving donation of the former Lewis Landfill in Cass County, near Beardstown, as well as a conservation easement on a 16-hectare (40-acre) parcel immediately adjacent and to the south of the landfill site. Additional parcels to the south-southwest of the landfill site represent excellent potential expansion sites for a proposed mud turtle reserve, among other mitigation uses.

Response 3: IDOT's selection of Alternative E would avoid direct impact to a number of threatened and endangered species along Alternative A. The selection of Alternative E, however, would still potentially impact the Illinois chorus frog habitat in the Beardstown area. These potential impacts to the Illinois chorus frogs could benefit by a mitigation site in the vicinity of the Lewis Landfill. The IDOT recommends that a more detailed study of Illinois chorus frogs in the project area be conducted in order to determine the extent of the impact and the suitability of the Lewis Landfill area for mitigation.

Comment 4: Recommend that Alignment E be pursued as the final alternative because of less adverse impacts to environmentally sensitive areas.

Response 4: Your support of Alternative E as the preferred alternative is noted, and is consistent with IDOT's selection.

The Illinois Department of Natural Resources (IDNR) also recommends that the Illinois Department of Transportation make application for an Incidental Take Permit based on the information provided in the Draft EIS. Reference is made on pages 4-46 through 4-49 that both alignments have several listed animal species that will be directly impacted. The Department (IDNR) considers the take of Illinois chorus frogs to be very likely with either alternative. The need for other species to be included in the incidental take authorization will depend on the alternative chosen and will require a closer evaluation to determine the likelihood of take. The need to consider the potential incidental take of listed plant species will need to be addressed although IDOT will own the corridor within which the road is built. The application process can take six months to process, therefore you will need to initiate this permit as early as possible to meet your project schedule. 5

In keeping with the resource policies established by the Illinois Department of Natural Resources (IDNR), the Interagency Wetland Policy Act allows a three year time period for wetland impact determinations and wetland compensation plans to be implemented before having to be re-evaluated. This same three year time period applies to the reviews for compliance with the state Endangered Species Protection Act and resource studies relative to the project.

Thank you for the opportunity to review the Draft Environmental Impact Statement. If you have any questions on the above, please contact me at 217-785-5500.

Sincerely,

Steve Hamer

Steve Hamer
Transportation Review Program
Division of Natural Resource Review

cc: File
John Betker/USACOE
Steve Davis/IDNR
Tom Flattery/IDNR
Carolyn Grosboll/INPC
Glen Kruse
Mike MacMullen/USEPA
Richard Nelson/USFWS
Charles Perino/IDOT

Illinois Department of Natural Resources

Comment 5: Recommend that IDOT make application for an Incidental Take Permit (Incidental Taking of Endangered or Threatened Species, 17 Ill. Adm. Code 1080). The permit takes about 6 months to process, therefore it should be initiated as early as possible.

Response 5: IDOT intends to make application for an "Incidental Take Permit". This will be secured in the next phase of work.

DEPARTMENT OF THE ARMY
ROCK ISLAND DISTRICT CORPS OF ENGINEERS
CLOCK TOWER BUILDING - P.O. BOX 2004
ROCK ISLAND, ILLINOIS 61204-2004

REPLY TO ATTENTION OF

August , 2001

Planning, Programs, and
Project Management Division

Mr. Larry Martin
Environmental Lead
CH2M Hill
8501 West Higgins Road
Suite 300
Chicago, Illinois 60631-2801

Dear Mr. Martin.

I received your letter dated July 19, 2001, with the enclosed Draft Environmental Impact Statement (DEIS) for U.S. 67 (FAP 310) between Jacksonville and Macomb, Illinois. Rock Island District staff reviewed the DEIS you provided. Coordination for this project with our regulatory staff is ongoing and should be maintained to assure that your project complies with Federal regulations. 1

No other concerns surfaced during our review. Thank you for the opportunity to comment on your proposal. If you need more information, please call Mr. Randy Kraciun of our Economic and Environmental Analysis Branch, telephone 309/794-5174.

You may find additional information about the Corps of Engineers' Rock Island District on our web site at **http://www.mvr.usace.army.mil**. To find out about other Districts within the Corps of Engineers, you may visit web site: **http://www.usace.army.mil/divdistmap.html**.

Sincerely,

Kenneth A. Barr
Chief, Economic and Environmental
Analysis Branch

US Army Corps of Engineers - Rock Island

Comment 1: Coordination for this project with the USACOE should be maintained to assure that the project complies with Federal regulations.

Response 1: We will continue to coordinate with your agency regarding this project to assure that it complies with Federal regulations.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

217/782-0547

August 16, 2001

Mr. Larry Martin
Environmental Lead
CH2MHILL
8501 W. Higgins Road
Suite 300
Chicago, IL 60631-2801

Re: U.S. 67 (FAP 310) Draft Environmental Impact Statement
Between Jacksonville and Macomb
Morgan, Cass, Schuyler, and McDonough Counties, Illinois

Dear Mr. Martin:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for improvements to U.S. 67 from Jacksonville to Macomb.

The Agency has no objections to the project; however, an NPDES construction stormwater permit will be required from the Division of Water Pollution Control (DWPC). Please contact Alan Keller at 217/782-0610 for specific permit requirements. Additionally, please contact the Army Corps of Engineers for any permit requirements for dredge and fill activities under Section 404 of the Clean Water Act. } 1

The Agency has not completed its review of the Draft EIS. However, a more detailed review will be done at the time a 401 Water Quality Certification is applied for in conjunction with the U.S. Army Corps of Engineers Section 404 permit. Please contact Bruce Yurdin, DWPC, at 217/782-3362 for further information about this aspect of the Agency's review.

Sincerely,

Bernard P. Killian

Bernard P. Killian
Deputy Director

cc: Victor Modeer, IDOT
Norman Stoner, IDOT

Illinois Environmental Protection Agency

Comment 1: An NPDES construction stormwater permit will be required from the Division of Water Pollution Control (DWPC).

Response 1: We note your comment that an NPDES permit will be required for this project. It is expected that this will be secured in the next phase of work, and we will continue to coordinate with your agency regarding this project.

Next Page